

## **REMARKS**

In Amendment G filed on October 20, 2004, Applicants addressed each of the Examiner's objections and rejections in the order in which they appeared in the Office Action. That amendment is incorporated herein by reference. It is respectfully requested that Amendment G be entered and considered at this time.

In furtherance of that amendment and in response to the PTO communication of December 23, 2004, Applicants have the following additional comments in response to the rejections in the Office Action.

### **Claim Rejections- 35 USC §112**

In the Office Action, the Examiner rejected Claims 33-34 under 35 USC §112, second paragraph, as being indefinite. In particular, the Examiner stated that "the second inorganic film" in line 5 of Claim 33 lacked an antecedent basis. In order to advance the prosecution of this application, Applicants amended Claim 33 in Amendment G to eliminate the objected to phrase.

Accordingly, it is respectfully requested that this rejection be withdrawn.

### **Claim Rejections - 35 USC §103**

In the Office Action, the Examiner also continued to reject Claims 1-10, 12, 14, 16, 18, 20, 22, 24, 26, 28 and 30-32 under 35 USC §103(a) as being unpatentable over "applicant's admitted prior art in combination with Chen." This rejection is respectfully traversed.

While Applicants respectfully traverse this rejection, in order to advance the prosecution of this application, in Amendment G, Applicants amended Claims 1-10, 31 and 33 to better claim the present invention. For example, these independent claims have been amended to recite:

Claims 1, 10 recite the step of forming a passivation film directly formed on the wiring;

Claims 2, 31 recite the step of forming a passivation film covering a surface of the wiring;

Claims 3, 33 recite the step of forming a passivation film deposited on the wiring;

Claims 4, 7, 8 recite the step of forming an insulating film directly formed on the wiring;

Claim 5 recites the step of forming an insulating film covering a surface of the wiring;

Claim 6 recites the step of forming an insulating film deposited on the wiring; and

Claim 9 recites the step of forming a first insulating film directly formed on the wiring.

Each of these claims then recites the step of forming a leveling film on the passivation or insulating film.

Applicants respectfully submit that the method of these amended claims is patentable over the cited references. For example, neither reference discloses or suggests the claimed method.

Further, it is respectfully submitted that the combination of Chen and “applicant’s admitted prior art” to arrive at the claimed invention is improper. Chen is directed to a method for Ultra Large Scale Integration (ULSI). See e.g. col. 1, ln. 15; col. 2, ln. 37; col. 4, ln. 22 and col. 5, lns. 42-43 in Chen. In contrast, the Background of the Invention of the present application and the claimed invention are directed to a method for fabrication of a display device. As these are very different devices, it is respectfully submitted that one skilled in the art would not refer to the ULSI method in Chen to arrive at the display device of the present invention.

Accordingly, it is respectfully submitted that this rejection is improper, and that the claims of the present application are patentable over the cited references. Therefore, it is respectfully requested that this rejection be withdrawn.

#### New Claims

Applicants also added new Claims 35-183 in Amendment G.

Claim 149 recites the step of forming an insulating film directly formed on the wiring;

Claim 161 recites the step of forming an insulating film covering a surface of the wiring; and  
Claim 173 recites the step of forming an insulating film deposited on the wiring, as discussed  
above.

For at least the reasons discussed above for Claims 1-10, 12, 14, 16, 18, 20, 22, 24, 26, 28  
and 30-32, these new claims are also patentable over the cited references. Accordingly, it is  
respectfully requested that these new claims be entered and allowed.

#### Information Disclosure Statement

Applicants also filed an IDS with Amendment G. It is requested that this IDS be considered  
prior to any further action being issued on this application. If any further fee should be due for this  
IDS, please charge our deposit account 50/1039.


#### Conclusion

It is respectfully submitted that the present application is in a condition for allowance and  
should be allowed.

If any further fee should be due for this amendment, please charge our deposit account  
50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

  
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